

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

VOLTAGE HOLDINGS, LLC, et al.,

Plaintiffs,

v.

DOES 1-100 et al.,

Defendants.

Civil Action No. 1:21-cv-00741

**[PROPOSED] ORDER GRANTING PLAINTIFFS' EX PARTE MOTION FOR
TEMPORARY ASSET RESTRAINT AND EXPEDITED DISCOVERY**

This Court, having considered the *ex parte* Motion by Plaintiffs VOLTAGE HOLDINGS, LLC; VOLTAGE PICTURES, LLC; AFTER II MOVIE, LLC; VENICE PI, LLC; WONDER ONE, LLC; SCREEN MEDIA VENTURES, LLC; AMERICAN CINEMA INTERNATIONAL, INC.; AMERICAN CINEMA INSPIRES, INC.; and 42 VENTURES, LLC ("Plaintiffs") for a Temporary Restraining Order including a temporary asset restraint, expedited discovery, issuance of letter of request, and leave to serve Defendants by alternative means pursuant to 17 U.S.C. §§502(a) and 1203(b)(1), 15 U.S.C. §1116 and Fed. R. Civ. Pro. 4(f)(3), 64 and 65, and for good cause shown, it is hereby;

ORDERED that the Motion shall be, and hereby is, granted;

ORDERED that IT RESEARCH, LLC shall immediately freeze all funds associated with Defendant VEEPN CORPORATION under its control and restrain and enjoin the transfer of any monies held in such accounts until further ordered by this Court; and it is further;

ORDERED that PayPal Inc., Paymentwall Inc. and AliPay US, Inc. shall immediately freeze all accounts associated with Defendant VEEPN CORPORATION and restrain and enjoin the transfer of any monies held in such accounts until further ordered by this Court; and it is further;

ORDERED that ES ACCOUNTING SERVICES INC. shall immediately freeze all accounts associated with Defendant VEEPN CORPORATION and restrain and enjoin the transfer of any monies held in such accounts until further ordered by this Court; and it is further;

ORDERED that Defendant VEEPN CORPORATION shall immediately cease using the term “POPCORN TIME VPN” on its websites including but not limited to <https://veepn.com/blog/popcorn-time-vpn/> and cease marketing its service as “POPCORN TIME VPN” or for using the piracy app Popcorn Time on its websites or other marketing materials;

ORDERED that Plaintiffs may effectuate service of the Complaint, Summons, Temporary Restraining Order and other pleadings by sending to Defendant VEEPN CORPORATION via registered electronic email to support@veepn.com and ad57ccecd58b4883aa9544a9d9e31e5a.protect@withheldforprivacy.com and by serving on Defendants DOES 1-100 at the email address they provide on their websites, on the contact email address of their domain registrars, and the email address they use to communicate with DataCamp Limited via registered electronic email via third-party provider such as RPost;

ORDERED that the Court issues the letter of request so that Plaintiffs may immediately serve limited discovery on DATACAMP LIMITED to discover the identifications of the accounts associated with the Internet Protocol addresses where Plaintiffs rights were infringed as well as any name, email address, address, telephone number, and payment method associated with such account(s) and communications in response to notices of infringement; and it is further ORDERED

that any information disclosed to Plaintiffs in response to discovery issued pursuant to this Order may be used solely for the purpose of protecting Plaintiffs' rights as set forth in the Complaint.

SO ORDERED THIS ____ day of ____, 2022.

United States District Judge